

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**AMANDA ARNOLD,
Plaintiff,**

Civil Action No.: 17-10432-DJC

VS.

**THE WOODS HOLE, MARTHA'S
VINEYARD AND NANTUCKET
STEAMSHIP AUTHORITY,
Defendant.**

**DEFENDANT'S MOTION IN LIMINE TO PRECLUDE
MENTIONING OF GROSS NEGLIGENCE**

Now comes the Defendant, Woods Hole, Martha's Vineyard and Nantucket Steamship Authority (hereinafter the "Steamship Authority"), in the above entitled civil action, by and through its undersigned counsel, Clinton & Muzyka, P.C., and hereby submits its Motion In Limine to Preclude Mentioning of Gross Negligence.

Plaintiff may seek to suggest at trial that the Steamship Authority was "grossly negligent." There is no evidence that this simple case involving the Plaintiff sticking her fingers between the door and hinge side jamb on the M/V EAGLE rises to the level of gross negligence. Mentioning "gross negligence" to the jury at trial will be unfairly prejudicial to the Defendant and should therefore be prohibited.

WHEREFORE, Defendant respectfully moves that the Honorable Court preclude both Plaintiff and Plaintiff's counsel from suggesting gross negligence at trial.

By its attorneys,
CLINTON & MUZYKA, P.C.

/s/ Olaf Aprans

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CERTIFICATE OF SERVICE

Pursuant to Local Rule 5.2, I hereby certify that the above document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on December 17, 2018.

/s/ Olaf Aprans

Olaf Aprans